

# Sustainability Policy

St1 Biokraft is committed to providing sustainable solutions in renewable fuels across the entire value chain, including production, upgrading, logistics, and the sale of biomethane and bio-fertilizer. Our mission is to enable a sustainable society and drive the green transition.

## Purpose and Scope

Sustainability is the foundation of how we operate. We balance environmental, social, and governance (ESG) responsibilities to create long-term value, comply with regulations and enable a fossil free, sustainable, and circular society. These responsibilities form our long-term strategy and daily operations, aligned with our Safety First focus and our four culture cornerstones: Be Collaborative, Be the Expert, Be Commercial and Be Open.

This Policy sets the direction and principles for how St1 Biokraft manages its environmental and sustainability responsibilities. Specific topics that require additional detail, such as Pollution Prevention (ESRS E2) and Circular Economy (ESRS E5), are described in dedicated annexes to this Policy.

## Our Commitments under ESG

### Environmental Responsibility

We are dedicated to reducing our environmental and climate footprint while maximizing climate-positive outcomes. We systematically pursue continuous improvements in environmental performance as a key factor for success.

We achieve this by:

- Recognizing environmental and climate considerations as central to our operations, designing effective and responsible solutions that reduce environmental harm and support circularity.
- Continuously working toward increasing the production and distribution of sustainable biomethane, contributing to a greener society.
- Preferring products, transportation methods and operational practices that have a low environmental and climate impact.
- Applying the precautionary principle by implementing preventive measures to avoid environmental damage.
- Maintaining an open and constructive dialogue with supervisory authorities and welcoming inspections as opportunities for improvement.
- Viewing continuous improvement as a prerequisite for business development.

Our approach to pollution prevention and circular economy is set out in Annexes 1 and 2, which provide further commitments and measures aligned with ESRS requirements.

## Social Responsibility

We believe our success depends on the wellbeing of people and communities. We are committed to responsible social conduct throughout our value chain.

We act by:

- Keeping a dialogue with, and taking social responsibility in, the local communities where we operate.
- Striving for our suppliers and partners to uphold good working conditions and reduce the risk of corruption, forced labour, child labour and discrimination in our value chain.
- Respecting and supporting internationally recognized human rights with our Human Rights Policy.
- Ensuring occupational health and safety standards in our facilities and operations.
- Promoting diversity, equality and inclusion throughout our workforce.

## Responsible Business Governance

St1 Biokraft is committed to conducting business with integrity, accountability and transparency across all operations and value chain engagements.

We uphold robust governance standards by:

- Complying with all applicable laws and regulatory requirements in the jurisdictions where we operate.
- Maintaining strong anti-corruption and anti-bribery safeguards, including zero tolerance for unethical conduct.
- Expecting all suppliers, contractors and other partners to adhere to the same standards through our Business Partner Code of Conduct and related due diligence requirements.
- Promoting transparency, traceability and accountability in internal and external relationships, aligned with our frameworks such as Code of Conduct, Trade Compliance and Human Rights.
- Avoiding conflicts of interest, ensuring ethical decision-making, and fostering a speak-up culture supported by accessible whistleblowing mechanisms.
- Taking ESG risks into account in decision-making, project development, investment screening, and partnerships.
- Including governance and compliance criteria in materiality assessments and ESG monitoring processes.

## Speaking Up

We encourage anyone to raise concerns in respect to sustainability matters via:

- Your line manager
- Legal / Compliance
- Our Whistleblower channel [Whistleblower | St1 Biokraft](#)

We strictly prohibit retaliation against anyone who raises a concern in good faith.

The detailed process for reporting, investigation, and protection of reporters is set out in our Whistleblower Policy.

Violations of this Policy or the Whistleblower Policy may result in disciplinary action, up to and including termination of employment, and where required, reporting to authorities.

## Policy Governance, Monitoring and Oversight

We monitor sustainability performance through defined targets and KPIs. We review annually anonymised case statistics, key performance indicators and progress against our sustainability targets as part of our governance framework, report to the Board and use for continuous improvement.

This Policy is owned by the Head of Sustainability, in coordination with responsible functions such as HR, Operations, and Finance.

Managers are responsible for developing and maintaining sustainability practices within their areas. We expect all employees to support and uphold this policy.

We retain all data according to St1 Biokraft's cross-border recordkeeping standards and relevant local laws.

This Policy will be reviewed at least annually, or sooner if required by legal or regulatory changes. It forms part of St1 Biokraft's broader governance framework, alongside our Code of Conduct, Trade Compliance Guidelines, Human Rights Policy, Work Environment Policy and broader compliance framework.

## **Annexes**

**Annex A.** Pollution Prevention

**Annex B.** Circular Economy

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*This Sustainability Policy was last approved on the 27<sup>th</sup> of November 2025 by the board of St1Biokraft AB.*

*St1 Biokraft AB, Board of Directors*

# Annex A. Pollution Prevention

## Purpose and Objectives

As part of St1 Biokraft's wider Sustainability Policy, this Annex outlines our approach to preventing, managing and reducing pollution in our operations and within our value chain. Our primary aim is to protect the environment, safeguard human health, and ensure compliance with permits, relevant laws and standards. Pollution prevention plays a key role in achieving our sustainability ambitions and reflects our commitment to operating safely, responsibly, transparently, in line with our Safety First principle and culture Cornerstones.

## Scope

This Annex applies across St1 Biokraft's business where pollution risks are present, including relevant parts of our supply and distribution chain. It addresses a wide range of environmental aspects, including air emissions, water discharges, soil pollution, noise, microplastics, and other substances of concern.

## Governing Principles

Our pollution management strategy is built around two key principles: the precautionary principle and the substitution principle. This means that where there is a credible risk of harm, or where safer alternatives are available, we act to prevent or minimise potential impacts. Our approach aligns with established frameworks such as REACH and CLP, alongside national legislation and permitting requirements.

## Objectives and Commitments

We commit to:

- Reduce harmful emissions and discharges to air, water and soil.
- Phase out substances of very high concern and adopt cleaner alternatives wherever feasible.
- Continuously strengthen our controls by setting both qualitative and quantitative targets to drive improvement.

## Measures and Resources

We take practical steps to meet these commitments, including improved emission controls, safer chemical handling and investment in cleaner technologies. St1 Biokraft allocates the necessary budget, technology and expertise to ensure these measures are effective and embedded in daily operations.

To meet these goals, we take tangible steps, from enhancing emissions control and improving chemical management to investing in cleaner technologies. St1 Biokraft ensures that the right financial, technological and human resources are in place to integrate these actions into everyday operations.

## Governance, Monitoring and Reporting

Overall responsibility, implementation, monitoring and reporting follow the structure set out in the Sustainability Policy, with regular oversight by management and the Board.

## Relationship to Other Documents

This Annex forms part of the Sustainability Policy and should be read alongside our Climate Policy, Human Rights Policy, Work Environment Policy and Code of Conduct. Together, these documents describe how we address environmental and social impacts responsibly.

# Annex B. Circular Economy

## Purpose and Objectives

This Annex is a key part of St1 Biokraft's wider Sustainability Policy, outlining how we embed circular economy principles throughout our operations and value chain. For us, circularity means using resources wisely. This includes cutting waste, embracing reuse and recycling wherever possible. Such approach is directly connected to our aspiration to be a Nordic leading biomass producer, and efficient use of raw materials is essential to our sustainable energy production. It supports our wider sustainability goals and reflects our commitment to operate safely, responsibly and transparently, guided by our Safety First mindset and our culture Cornerstones.

## Scope

This Annex applies to St1 Biokraft's full value chain, from sourcing raw biomass to end use of our biofuel and biofertilizer. It covers:

- Upstream: responsible biomass sourcing, transport, and logistics.
- Operations: use of energy, biofuel and biofertilizer production, responsible recycling management, and asset maintenance.
- Downstream: use of biofuel and waste recovery.
- Broader impacts: packaging, maintenance materials, value chain and partnerships.

Circularity applies not only to fuels and feedstocks but also to packaging, machinery and technological operations.

## Governing Principles

Our approach is grounded in thoughtful design and efficient use of resources:

- With our production know-how, we design processes and assets to last longer and can be easier to repair or recycle.
- We follow the waste hierarchy: prevention first, then reuse, recycling, energy recovery, with landfill only as a last resort.

## Objectives and Commitments

We commit to:

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- Cut waste volumes and increase recycling rates across sites and processes.
- Develop secondary markets for biofertilizer.
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- Work closely with our business partners across our value chain in promoting circular standards through our Business Partner Code of Conduct.

## Measures and Resources

To turn our commitments into action, we invest in:

- Logistics powered by biofuels and production systems that designed for resource efficiency and maximise material recovery.
- Collaborations with suppliers, customers and industry partners to expand markets for biofuel products.

St1 Biokraft encourages all business partners whether suppliers, logistics providers, contractors, and customers, to align with our Safety First culture and circular economy commitments.

## Governance, Monitoring and Reporting

Overall responsibility, implementation, monitoring, and reporting follow the structure set out in the Sustainability Policy, with regular oversight by management and the Board.

## **Relationship to Other Documents**

This Annex forms part of the Sustainability Policy and should be read alongside our Climate Policy, Human Rights Policy, Work Environment Policy, and Code of Conduct. Together, these documents describe how we address environmental and social impacts responsibly.